

Robert W. Timmins
1 MAY 2012
Anchorage, Alaska

Comments on Native Rural Alaskan Policy Issues Regarding: Lifeline/Broadband, Eligibility Database and Digital Literacy Training

Executive Summary:

This analysis will show clarity concerning whether it is good policy to implement and expand broadband to the Lifeline program especially in regard to the rural Native Alaskan segment. I suggest that if administered properly, this program would pay handsome dividends in transforming participants to a better lifestyle with opportunity to move up the productivity chain both on a personal, educational/professional level and overall as a community.

Household bundled broadband should be seriously considered especially for rural native Alaskan families as a policy shift to enhance its acceptance and enable the productivity for this population.

The time for the establishment of a national digital eligibility database has come and should be paid for and administered by the federal government in conjunction with the various states much as the national broadband plan was successfully brought about. To prevent fraud,

waste and abuse, this new database should be used in conjunction with the national duplicates database.

Digital literacy training (DLT) for broadband and other applications is also discussed as a valuable enabler for most native Lifeline applications should broadband be adopted into the Lifeline system. Relying heavily on the suggestions and expertise of the rural native Alaskan population to tailor these programs to fit the particular needs of this demographic base as well as understanding the unique weather and geographic features of the state will help ensure the success of this desired and potentially productive program. Cultural acceptance of any new product or program can be problematic and create, at times, insurmountable issues. Suggestions are highlighted to mitigate those odds and put them back in our favor as Alaskans.

Introduction:

The pilot project the FCC is proposing for broadband lifeline should definitely include Alaska, because if it can work here, especially if it focuses on rural native digital literacy training with a cultural emphasis, the project will be a huge success and selling point for the rest of the nation! There will also be research on the impact of new broadband services carried out by researchers in the State of Alaska, therefore we urge the Commission to seriously consider the feasibility and desirability in furthering its objectives and goals by coordinating with our state researchers through a formal evaluation of an Alaskan Lifeline pilot project.

This conclusion is based on personal experience from observing and studying the records and needs of this segment of our rural native population. Through a properly run and executed pilot program with adequate controls in place, much data can be collected and analyzed to prove the inherent value in further funding and expansion for this initiative.

The reason that this particular broadband pilot program should receive highest priority to be tested among the rural native Alaskan population is based on three supporting issues: The modernization and distribution of the Lifeline program to now include broadband, the development of a national eligibility database of participants, and a supporting digital literacy program. To introduce the layout of this paper, the following foundation will be established upon which conclusions and policy recommendations will be based.

The three subject areas addressed in this paper to be analyzed and commented on come from the FNPRM, 6 Feb 2012.(1) The Lifeline and Link Up reform issue will focus on some of the more relevant proposals seeking comment, their implications, and policy developments to expand Lifeline beyond simple voice service to include broadband. The next area discussed will be Alaska Tribal implications for establishing a national database for eligibility purposes. Proposals and comments concerning implications, expectations and outcomes for Digital Literacy Training will be addressed last. It is strongly believed that an intelligently planned and administered DLT policy is the best way to promote the first two proposals in a sustainable and productive way that accomplishes the FCC's three stated goals in paragraph 24 of the FNPRM: "1) ensuring the availability of voice service for low-income Americans, 2) ensuring the

availability of broadband service for low-income Americans and 3) minimize the contribution burden on consumers and businesses.”(1)

In the Lifeline and Link Up FNPRM of 6 Feb 2012 it was determined that in order to achieve the programs’ ultimate goals and objectives, a reworking of the current system was in order. Were federal funds not only being used for intended purposes but were the ultimate goals being satisfied? How was this knowledge to be determined? The FNPRM, 6 Feb 2012, paragraph 24, clearly states that measurable goals were needed since the GAO in 2010 told the FCC that it “had not quantified its goal of increasing telephone subscribership among low-income households and had not developed and implemented specific outcome-based performance goals and measures for the program.”(1) This was to be accomplished while minimizing the size of the program. This observation will be the lens through which we will focus our remarks and conclusions as we bring in comments by interested parties that are relevant to the stated Rural Native Alaskan ICT issues described above.

On a personal note, I have lived in Alaska for over twenty years and is somewhat familiar with the rural nature of the state. As an avid outdoorsman, the importance of communication service when remote is of the highest importance to survival. Depending on Satcom is very expensive and cumbersome for a hunter, but for fulltime “bush” resident it can be unsustainable. Rural native residents in over 200 villages across Alaska truly depend on reliable phone service for their very survival most every day of their lives. Broadband would be of inestimable value in bringing civilization to Tribal lands in rural Alaska through the programs that will be commented on below.

With relevant research available through the Institute of Social and Economic Research (ISER)(2) which is part of the University of Alaska, Anchorage (UAA), I reference Scott Goldsmith's article titled "Understanding Alaska's Remote Rural Economy" January 2008 which indicates that average rural Alaskans on a per capita basis were anywhere from 25 to 50% below the state average-largely due to a combination of part-time work and lower wages. Poverty being widespread under standard measures among children in the region, 63% qualified for free meals at school compared with 26% in other Alaska districts in the 2005 report.(3) I sense that similar figures exist today across rural Alaska.

Analysis and Discussion:

Tribal Lifeline and Link Up:

I believe that the annual recertification process now adopted will serve as a standard and uniform set of procedures eliminating confusion and overhead expense into the future.

By widening the net for program participants and easing re-certification procedures, yet at the same time standardizing them among states and ETCs, low income Tribal communities and individuals will be able to gain access to what will potentially be a new and transformed life through enhanced, affordable communication services.

In summarizing the FNPRM on this issue, paragraph 149 states that the FCC has determined to clarify its rules on low-income residents of Tribal lands who may be eligible for program support predicated on being a current beneficiary of certain federal or Tribal assistance programs or income level. Next, the FCC has widened the eligibility for the program

to those participating in the Food Distribution Program on Indian Reservations (FDPIR), which distributes free food to low income households on or near Indian Reservations. Thirdly, a regulation change has been approved whereby enhanced lifeline support will be offered through a process involving Tribal governments seeking to re-designate off-reservation lands as specially designated Tribal lands for the purpose of receiving enhanced Lifeline support. And last, annual self-certification by low-income Tribal residents that live on Tribal lands is now authorized. By reporting this information to the providing ETC, the information is then passed on in the continuing annual re-certification process, but which is now standardized. (1)

I recommend that the FCC should implement and administer adequate checks for Lifeline eligibility through a mechanism that is both agreeable and cost effective to the providing ETCs. Just shifting the burden from federal agency to the local provider with no adjustment or consideration for time, effort and resources involved may not produce the desired results.

As the FCC says in paragraph 384/385 of the FNPRM: "...A uniform rule will ensure that adequate checks for ineligible consumers are being performed by ETC's in all states, thereby reducing potential fraud, waste and abuse in the program." Continuing, "...data can be easily submitted to USAC by ETC's, states, and third parties, as applicable, and to minimize the administrative burdens for compliance with the rules we adopt today." (1) It appears that many commenters disliked the suggestion that the verification responsibility would be placed on their shoulders. I certainly can appreciate that sentiment, especially from a cost and time viewpoint. Should it not be a federal responsibility because Lifeline is a federally funded

program? This would then, however, need more federal overhead and oversight. In my comments below in establishing a National Eligibility Database, various options are discussed for policy making on this issue.

I recommend that the Commission should allow for households on tribal lands to apply the entire \$34.25 of the enhanced Lifeline discount to the cost of bundled voice and broadband service.

Referencing comments of the Gila River Indian Community and Gila River Telecommunications (GRIC/GRTI) , Inc. filed 2 April 2012, this native company in Arizona suggests that first and foremost, the Commission should allow for households on tribal lands to apply the entire \$34.25 of the enhanced Lifeline discount to the cost of bundled voice and broadband service. They say that by applying this new format of a bundled service to a household with one ETC service provider would ease concerns of fraud, waste and abuse while not significantly increasing cost to the Lifeline program. Benefits would be immeasurable they assert, as many more households would take advantage of the program. (4) This would likely be the case for Alaska's rural native community as well, and I believe that the only way to know of the advantages and payoff of changing policy in this way would be to perform some sort of metrics and surveys that would provide hard data using reliable demographics as well as financial modeling to determine present costs versus future costs were this new idea to be implemented, or it would just be a guessing game.

Next, I believe that the dual reimbursement of Link-up combined with "High Cost" is prudent and needs to remain in effect for Alaska's rural Tribal communities based both on my

understanding and experience with conditions in rural Alaska and that they are not improving any time soon. Most native households are at or below the national poverty line (2,3) and would benefit in quality of life as well as increasing the value of the broadband system itself as it expands to include more users.

I recommend the continuation of double recovery for high cost fund recipients for those on native Tribal lands especially in rural Alaska. There are several good reasons for the extra expenditure as described below:

In referencing section VIII from the Joint Commenters, they discuss ideas about eliminating link-up funding on Tribal lands to avoid double recovery by high cost support recipients. (5) The Commission has evidently decided to continue double recovery for high cost fund recipients but the reasons are not clear. Perhaps it is because there was an oversight or more likely, because the costs of remote access is that much more than provided by the single link-up source. While this policy depletes the USF reserves at a much faster rate, without it, the ETC providers would be in a negative ROI and thus the business model would be unsustainable. Of course it is prudent to check on the “tier four” eligibility of the Tribes and see how those funds interplay with the high cost fund application to Link-Up. While equality in Link-Up fund administration is a worthy goal for ETCs, especially now due to the elimination of the fund for non-Tribal entities, I believe that Tribal lands, most especially those in rural Alaska present unparalleled challenges in distance, weather and terrain; therefore there is higher cost in deploying infrastructure and service to those disparate communities across Alaska. With education and telemedicine requiring 3 to 4 Mbps to conduct business (2), a rather robust and

thus expensive deployment of technology will be required, especially now that it is no longer acceptable or desired to require or incentivize a provider to build capability or availability along roads and highways, but now will require actual communities to be linked thus enabling OWL, e-rate and telemedicine for anchor institutions along with link-up for the qualifying native Tribal residents.

Counter to the recommendation of the Joint Commenters' conclusion below, the dual reimbursement nature of Link-up combined with "High Cost" is prudent and needs to remain in effect for Alaska's rural Tribal communities.

The Joint Commenters summed up their argument to eliminate double recovery for Tribal lands by pointing out that with the high cost reform order that dedicates \$50 million in one-time support for the Tribal Mobility Fund in addition to the \$300 million for which qualifying ETCs in Tribal lands are also eligible, plus the "up to \$100 million annually for support of Tribal lands out of the \$500 million annual Mobility fund phase II support along with the \$100 million annual Remote Areas Fund serving extremely high cost areas including "potentially Tribal lands" all this dedicated money should make up the difference in favor of eliminating the double recovery fund for the tribes.⁽⁵⁾ A careful look at the wording of these funding earmarks leaves a lot of holes in the commenters' argument. Many of the above programs and funding policies are *not* guarantees for Tribal connectivity and infrastructure. The \$50 million allotment serves as the only dedicated "native rural Tribal Alaskan cutout". The Alaska Rural Coalition (ARC), which is a coalition of rural Alaskan ETCs, some of which are owned by Alaskan native corporations, commented on a 2 April 2012 filing, that this \$50 million on time support is for

advanced services on Tribal lands as a replacement for the potential loss of Link-Up support. The ARC then suggested that parameters for distributing the Tribal Mobility Fund Phase I have not been established therefore it is impossible to determine if the funds will be sufficient to cover the costs to deploy advanced wireless technology mandated by the order. The ARC then suggested that based on their estimate of costs involved for this project, the \$50 million is largely insufficient to provide construction requirements and broadband obligations covered by the link-up program.(6) Therefore based on the description of the available programs and the competitive funding characterization involved, meaning that the funding could be allocated to other sections of the country and not rural Alaska, I conclude that the dual reimbursement nature of Link-up combined with “High Cost” is prudent and needs to remain in effect for Alaska’s rural Tribal communities.

I suggest that residents on Tribal lands should not be permitted to apply their allotted Tribal lifeline discount across more than one supported service per household.

ACS comments with an Ex Parte filing on 18 Jan 2012, that residents on Tribal lands should not be permitted to apply their allotted Tribal lifeline discount across more than one supported service per household. (7) The reason given is that administrative and process confusion will likely result in carrier to carrier disputes as well as customer to carrier irregularities. I concur that confusion will likely result with costly billing procedures being necessary to keep track of too many details to be effective and really necessary for the customer and fulfilling lifeline mandated requirements.

I propose preserving the current Lifeline support amount as well as preserving the current Link up for Tribal lands along with the Tier 4 funding formula.

GCI Inc. in its filing on 2 April 2012 comments about preserving the current Lifeline support amount as well as preserving Link up for Tribal lands. The issue of continuing with flat rate reimbursement, they say, is desirable due to its relatively simple administration. The proposal to vary support rates would be introducing more complexity into the process. When the Commission recently eliminated tiers one through three, administrative efficiencies were gained. Tier four for Native Tribal lands was preserved however, helping low income residents remain connected due to much higher costs to providing ETCs. (8) I agree that the penetration rates have markedly increased in this segment of the population indicating that the Lifeline program has been a resounding success since 1994. With a starting percentage of only 72% in 1994, and now reaching over 92% of the low income population, this program certainly appears to be fulfilling its mandate.(3)

I recommend that efforts to preserve the current Lifeline and Link Up support amounts should be given high priority due to its remarkable success over a sizeable time period. This is certainly true for the eligible Alaskan native population, though much work remains to be accomplished.

The FCC seeking comments preserving the current Lifeline support amount and preserving Link up for Tribal lands is something I agree should be preserved due to the remarkable success of these programs and policies and the fact that progress is still being observed linking up lifeline eligible participants. GCI suggests that “reducing support now would undermine low-

income consumers' decisive move away from landlines to mobile telephony, and sound, practical reasons for that move." (8) Mobility equals more in value and flexibility. The homeless and those in unstable living arrangements including rural and very remote low-income rural native Alaskans find that mobility is a must to their very survival. Lifeline mobility provides 911 security when traveling and separated from friends and family. I concur that there is no good reason to now reduce or eliminate a program that is currently producing the Commission's desired results.

Establishment of a National Eligibility Database:

An unfunded mandated order for ETCs and states to establish a national eligibility database would be difficult to accomplish with limited local resources; therefore results would be unpredictable and likely present an unfavorable outcome. Several recommendations follow:

In referencing section VII from the Joint Commenters, they discuss ideas about establishing a nationwide, front-end eligibility database solution. The goal they assert is to efficiently and effectively verify eligibility of new Lifeline customers. By following a federally mandated, uniform nationwide framework, ease of use and access to data for all ETC's and their agents would result.(5) I agree that this is the target outcome and that all ETC's should be trusted users of the database resource. The question then, not only generated by this group but many other ETC commenters, is that none want to be left financially responsible for federally unfunded mandates, working on generating a national database using their own resources, reducing their profit margins in order to keep the USF contract. Though there is no perfect

solution to this dilemma of who should do the work and who should foot the bill, **a properly managed national database will indeed, in my opinion cut down drastically on fraud, waste and abuse.** The estimated dollars saved per year from having such a data base should fund the program because it is being budgeted for and spent anyway. Next, **I recommend that the Lifeline beneficiaries do the work of inputting their own data as opposed to the providers, by entering their information via an established, predetermined protocol to obtain and maintain services.** While it is important to provide all underprivileged with phone services, asking for them to do verifiably accurate work to populate a database format with their own information would save time and money for the government and ETC's especially if it was **tied to the incentive of keeping user's accounts open with stiff penalties explained and applied where indicated (many hands make light work).** With technology today, such a database would be relatively cheap to produce and administer with available learning algorithms, artificial and business intelligence programs available in the scientific and business communities all combining to ensure program accuracy, integrity and efficiency.

Michigan Public Services Commission (MPSC) who filed on 2 April 2012 posited that without additional funding, states will be unable to implement their portion of the national database.(9) This seems to be a common comment and theme throughout. Coordination between federal and state agencies has produced desired results in the past, so they compare this project to the National Broadband Plan which is a consolidation of fifty state inputs. I concur that it is not productive to reinvent the wheel with this project. With each state demonstrating different needs, the FCC should be mindful that this will be part of the process and plan accordingly, Alaska notwithstanding. **Access to customers' personal information**

should be collected at sign-up along with verifiable consent to access this information on a need to know basis, and this should be made available to all concerned parties such as ETC's on a confidential and secure basis. Concern has been raised over ETCs stealing customers from each other because of access to the proposed data base, but I assert that with stiff penalties in place for this type of unethical behavior, such would not occur. The MSPC states that **the national eligibility database and the national duplicates database should coordinate information with each other.** (9) I concur absolutely with this conclusion. This would be a built in fraud, waste and abuse detector and would work well in Alaska just as it would in Michigan.

Another idea for developing a national database is to **look at the State of Alaska's Permanent Dividend Fund (PFD) which is a rather successful model and has been in operation for over twenty years.** With few fraud cases and overlaps, I recommend that in addition to the IRS tax return system as a model, perhaps the PFD fund system would provide insight to how the national database might be set up and administered. For further information, interested parties should go to www.pfd.state.ak.us/contacts.aspx and examine the "Contact" page that presents itself. On the page, a PFD fraud hotline, phone number and web portal is available for citizen self-policing, a collections email listing for assessed dividends or repayment questions and concerns, as well as a governmental agency database access portal for confidential information release issues for local, state or federal governmental agencies. These are all issues that have been requested for comment concerning a national database, yet I have seen no reference to this highly effective system already in place and operational.(10)

Finally, as a disincentive for fraudulent accounts, as with the PFD, high publicity when someone gets caught not following the rules and goes to trial or has some other undesirable consequence occur as a result, perhaps, a fear of stepping over the line will be the norm. In Alaska, we police ourselves and create a sense of responsibility for the PFD program because as state residents we all own the fund and the program. By creating a sense of ownership I believe a sense of personal responsibility ensues and is displayed by most, thus keeping the majority of participants within the bounds set by law.

Digital Literacy Training (DLT):

I recommend the promotion and promulgation of a locally administered but nationally sponsored digital literacy program. I recommend that handicapped a digital literacy class should be an absolute requirement for every participant in the lifeline program regardless of if they opt for voice only, digital, bundled or unbundled services, unless otherwise. I believe that good policy requires responsibility and contribution from the low-income beneficiaries of such programs.

In an attempt to incentivize, educate and motivate those low income individuals eligible to qualify for Lifeline support, I think that once those in this group are capable and motivated, those desirous could be offered paid positions within the ETCs or the FCC as adjuncts to work for a temporary amount of time with others in the same community, Tribe or ETC served area as a digital literacy trainer. As a self-perpetuating and funded concept, such a program could be funded with dollars tracked, measured and saved as those lifeline participants become gainfully employed and rise above the poverty level due to newly acquired skills in digital literacy, among

others. The Joint Commenters, in section III of their report mentioned above, feel that the ETCs should get involved and be allowed to contribute to such a program, not just schools and libraries. The FCC, they say, should fund training on all the various devices available looking to ETCs in particular as they have the unique ability to target low income individuals especially those who could benefit from such a training program in rural and poor urban areas. (10) I believe that while urban areas are of importance, rural areas in Alaska present a much more significant problem with logistics and therefore need to be given much more attention in time, money and resources. The Joint Commenters state that ETCs can partner with companies such as Microsoft and Google as well as non-profits to work on providing an effective curriculum. Past results from such classes in Ohio conducted in libraries and community centers have resulted in 87% of participants desiring to subscribe to broadband within a year of taking the course. (5) **I believe such figures should be backed up with actual adoption rates, not just wishful thinking.** However with nascent programs and courses, not much real data exists, but I expect that future actual results will be a stark positive contrast to present statistics with no digital literacy training results to draw on.

I feel that in addition to ETCs, libraries and community centers, community colleges offering credit, and perhaps requiring such fundamental courses prior to taking follow-on courses, DLT would be an incentive for those desirous to continue their education in any one of the multi-disciplinary areas of computer literacy. I again recommend that a digital literacy class should be an absolute requirement for every participant in the lifeline program regardless of if they opt for voice only, digital, bundled or unbundled services, save those few handicapped who are unable to avail themselves. **I believe that good policy requires responsibility and**

contribution from the low-income beneficiaries of such programs. It is becoming on the FCC to be as responsible as possible with tax dollars allocated in this area. Not only requiring an initial digital literacy class within a reasonable time of subscribing, but either repeating classes every month or participation in follow-on courses specializing in different platforms would be useful in building basic skills.

Regular participation, showing progress and skill with a self-written, measurable and achievable objective or goal would serve as a reasonable “fee” for a membership in the Lifeline program. As mentioned above, those on the Lifeline program that are clinically mentally handicapped or otherwise unable to avail themselves would be exempt. I agree that the ETCs are uniquely positioned to provide the critical transition from introductory training to broadband adoption through an incentivized support system that could be worked out to include obtaining Lifeline benefits for voice or bundled broadband data services.

In a USTelecom filing 2 April 2012, these commenters recommend that the FCC should avoid premature decisions on the Digital Literacy Program, questioning whether the Commission actually has the authority to administer such a program focusing primarily on proper use of Universal Service Funds. To quote:

“As for the digital literacy program, USTelecom is wary that the FCC has the authority to fund and administer such a program. USTelecom explains, “It is premature to address potential funding of digital literacy programs when the Commission has not yet even accepted applications for the broadband pilot programs which will provide needed information on the costs and effectiveness of various strategies to increase broadband adoption.”(11) This I

disagree with as a properly administered DLT program would be a great foundation on which all others would ride. With a little education and help, low income users might just rise above the poverty level, and become contributors to the system much as the Peace Corps attempts to give a leg-up instead of a hand-out. USTelecom then asserts that “The suggestions in the Lifeline Reform FNPRM that a household be able to split the Lifeline discount across two or more lines would be an administrative nightmare as well as be inconsistent with the purpose of Lifeline support, which is to ensure that the household has a connection to the outside world, not multiple connections.”(11 **I do agree with the recommendation to not change the monthly support level of \$9.25 and the one-per-household rule at this time** because of the very successful time based results from maintaining the status quo from many of the commenters. Splitting discounts across multiple lines is counter to the intent of the program and not a reasonable implementation of the program and is further discussed below:

I believe the discussion should be initiated as to how to promote and promulgate a nationally sponsored digital literacy program, as these technological advances are more than Alaska’s rural Tribal and other sizeable percentages of our population can deal with. Much like building cars and roads but with no one skilled enough to drive or navigate, this program is as timely as it is necessary, especially among those who are Lifeline qualifiers.

As to the question of whether there should be a split in the discount across two or more lines in one household I think the overall intent of the program is to help just one qualifier in the house-hold. I conclude that the splitting of funds is counter to the real intent of the program and should not be changed and agree with USTelecom on this point.

Though the FCC implies it would be the same lifeline financial outlay for one, or multiple lines, as the total money qualified for would not change, I ask the question “that if a person is too poor to own one line, then how is he able to finance multiple lines?” Accounting irregularities and impossibilities would be rife as well; furthermore I feel the overall intent of the program is to help just one qualifier in the house-hold. I conclude that the splitting of funds is counter to the real intent of the program and should not be changed.

The Native Alaskan rural Tribal community has struggled for years with the State Education System as presently administered. **I think that with a focused and robust digital broadband system set up in each community’s anchor institution such as On-line With Libraries, (OWL), e-Rate and Telehealth, allowing for ongoing services, education and continuity, the rising generation would see and experience the benefits of the technology,** develop a sense of its personal applicability and payoff, as well as the value of being connected to other disparate communities of rural native Alaskans across the State. I feel that digital literacy objectives and goals will ensue and be achieved.

Those entities with proven track records and perhaps lower costs which are already “known quantities” in the community, city or state should be qualified to remain and be active participants in the DLT training program deserving of those federal funds to keep a productive program running. Through active metrics, the government can monitor productivity and discern whether or not an entity should be supported or closed down.

Referencing the comments from the Michigan Public Service Commission (MPSC) filed on 2 April 2012, issues of the Commission limiting funds for digital literacy to those entities that

already offer formal digital literacy training services were criticized. I agree with the MSPC criticism of this policy, as this limitation might apply to rural tribes in Alaska too. Those entities with proven track records and perhaps lower costs which are already “known quantities” in the community, city or state should be qualified to be active participants in the DLT training program. It is my opinion that with all centrally planned and administered programs, inherent inefficiencies result through inability to fine tune and know all the important and local details. **Therefore I recommend what MSPC suggests to do by providing digital literacy funds to the various states such that the states’ regulatory agency(s) could sub-grant these funds to appropriate training services.** Perhaps creating a public-private partnership with different entities would solve the problem as did the Michigan’s Connect Michigan program. (9) With having the Alaskan Native community, especially those in rural Alaska actively involved in setting up a highly productive and culturally embraced digital literacy program in areas and communities where it is most needed and welcomed, the program’s success would be virtually assured. Central to this would be to have as many as possible with low incomes who are on Lifeline also involved to create a sense of ownership and responsibility to the program to create a culture of acceptance and success with other rural native Alaskans. I concur with MSPC that a state based program established by the federal government with the State Broadband Initiative (SBI) appears to be a natural and logical solution to the issue of digital literacy.

Referencing comments of the Gila River Indian Community and Gila River Telecommunications, they suggest that by using USF funds to provide digital literacy training to tribal members, profound changes would ensue. Care should be taken that best addresses the unique culture and other characteristics of tribal lands such as “ensuring that the

programs...support outreach to educate residents of tribal lands on the importance of digital literacy,...encourage residents of all ages to become digitally literate, especially elderly residents,...provide for access to digital literacy training in more than just schools and libraries...and provide for additional support for residents of tribal lands as well as priority for funding for tribally-owned and operated telephone carriers.”(4)

All these points would be similarly beneficial to Alaska’s native rural population and I concur with their conclusions.

In conclusion:

By the Alaska Federation of Natives (AFN) or other Alaska native governments or agencies building a case for bringing broadband to the various communities and demonstrating just how the technology will be used to resolve specific issues plaguing the families in the rural communities across Alaska, policymakers will likely pay more attention to dedicating more scarce resources to solving these problems.(12)

By using planned, focused metrics and statistics not yet implemented, compelling data and knowledge will be uncovered that can be used to develop better decisions resulting in enduring coordinated native governments working together with state government to create mutually agreed upon policy formulation resulting in a productive and need-based sustainable effort to address native Tribal issues more effectively than a “shot gun” approach often wasting scarce time and resources.

Through two or three well-organized and controlled pilot programs involving predetermined native communities, along with appropriate control groups using broadband, the DLT program and database reform, I believe that it could be demonstrated in a real-time demonstrable and scientific way that the Native Community could prove beyond a reasonable doubt that these programs produce the predicted results by changing lives for the better. This would then provide the leverage to justify more favorable policy for higher dedicated funding for rural Alaska.

DLT and broadband deployment need to occur at near the same time to be effective, therefore DLT funding and methodology will need to be brought about through informed and participatory policy formulation involving rural native governments and the various communities involved. **I recommend that as various community residents obtain skills, enthusiasm and vision for the transforming effects of broadband, they should be enlisted to visit and train others in their communities and neighborhoods such that DLT among natives will be self-sustaining, accepted and productive.** In addition, an option of virtual learning over the broadband system offered and deployed would be made available and, preferably hosted by a native expert to help overcome any cultural antagonism.

Native cultural exceptionalism should be encouraged with the resulting goal of rural natives willing and able to regularly exploit the resources of broadband, further enabling their exceptionalism in newly acquired skills, interests and direction. With the educated and productive use of broadband across rural Alaska, purpose, productivity and profitability for parent and student alike will turn vision into reality, transforming discouragement, loneliness

and hopelessness into a collection of vibrant connected communities around the clock the whole year through with those in the lower 48 and around the world.

References

- (1) FNPRM (Report and Order and Further Notice of Proposed Rulemaking) Released 6 Feb 2012
- (2) Hudson, Heather, Digital Diversity: Broadband and Indigenous Populations in Alaska, Journal of Information Policy 1 (2011): 378-393.
- (3) Goldsmith, Scott, Understanding Alaska's Remote Rural Economy, UA Research Summary No.10, Institute of Social and Economic Research, University of Alaska Anchorage, Jan 2008 http://www.iser.uaa.alaska.edu/Publications/researchsumm/UA_RS10.pdf
- (4) Comments of the Gila River Indian Community and Gila River Telecommunications, Inc. filed before the FCC, 2 April 2012
- (5) Retrieved from JHeitmann@kelleydrye.com filed before the FCC, April 2, 2012, Comments of the Joint Commenters, 2 April 2012 by Kelley Drye and Warren LLP
- (6) The Alaska Rural Coalition's Lifeline and Link Up comments (ARC) filed before the FCC, 2 April 2012
- (7) Comments of ACS, Ex Parte Letter, Karen Brinkman, KB@KarenBrinkman.com, filed before the FCC, 18 January 2012
- (8) Comments of General Communications, Inc. filed before the FCC, April 2, 2012
- (9) [Comments of the Michigan Public Services Commission \(MPSC\) filed before the FCC, 2 April 2012](#)
- (10) www.pfd.state.ak.us/contacts.aspx (Alaska's Permanent Fund Dividend website) retrieved 1 May 2012
- (11) Comments of USTelecom filed before the FCC, 2 April 2012
- (12) Comments of the Alaska Federation of Natives filed before the FCC, 23 May 2011
- (13) Telephone Penetration by Income by State at 11, FCC {May 2010}, available at http://hraunfoss.fcc.edocs_public/attachmatch/DOC-2979861.pdf

